

## Indictment – Page 1 of 4

a. On or about December 5, 2007, **Nwankudu** knowingly caused a materially false and fraudulent loan application for a mortgage loan to purchase 2904 Fairway Drive, Cedar Hill, Texas, to be submitted to CitiMortgage. **Nwankudu** knew at the time the loan application was submitted that it contained material misstatements, including misstatements regarding the employment, income, assets, and intention to occupy the property of E.B., the loan applicant, a person known to the Grand Jury.

b. On or about December 5, 2007, as a result of the false statements on the loan application and other documents, CitiMortgage approved a mortgage loan in the amount of \$630,000 to fund E.B.'s purchase of 2904 Fairway Drive, Cedar Hill, Texas.

c. On or about December 6, 2007, LandAmerica Commonwealth Title of Dallas, Inc. wired \$94,949.36 to Account No. xxxxxxxx5582 at Bank of America, which is an account controlled by **Nwajagu**, for "upgrades" to the 2904 Fairway Drive property on the basis of a fake invoice that was submitted to the title company.

d. On or about December 7, 2007, **Nwajagu** wired \$37,500 from Account No. xxxxxxxx5582 at Bank of America to Account No. xxxxxxxx0932 at Bank of America, which is an account controlled by **Nwankudu**.

e. On or about December 7, 2007, **Nwajagu** withdrew \$50,000 from Account No. xxxxxxxx5582 at Bank of America in the form of cash.

All in violation of 18 U.S.C. § 1349 (18 U.S.C. § 1341).

Count Two  
Mail Fraud  
(Violation of 18 U.S.C. § 1341)

1. The Grand Jury realleges and incorporates by reference all of the allegations set forth in Count One to this Indictment as though fully set forth herein.
2. On or about December 5, 2007, in the Dallas Division of the Northern District of Texas, defendants **Prince Chiemela Nwankudu** and **Echezona Chuks Nwajagu**, aided and abetted by one another and by others known and unknown to the Grand Jury, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses, representations, and promises, knowingly caused to be delivered by the United States Postal Service and private commercial interstate carriers, according to the directions thereon, an envelope containing loan documents relating to the purchase of residential property located at 2904 Fairway Drive, Cedar Hill, Texas, from LandAmerica Commonwealth Title of Dallas, Inc. in Dallas, Texas, to CitiMortgage in O'Fallon, Missouri.

All in violation of 18 U.S.C. § 1341.

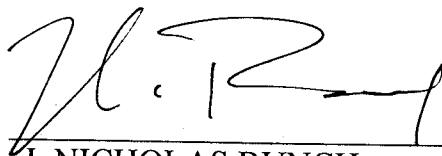
FORFEITURE NOTICE  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

In accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction for the offense alleged in Count Two of this Indictment, defendants **Prince Chiemela Nwankudu** and **Echezona Chuks Nwajagu** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the respective offense.

A TRUE BILL

  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
J. NICHOLAS BUNCH  
Assistant United States Attorney  
Texas Bar No. 24050352  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242  
Telephone: 214.659.8836  
Facsimile: 214.767.4100  
Email: [nick.bunch@usdoj.gov](mailto:nick.bunch@usdoj.gov)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

PRINCE CHIEMELA NWANKUDU (01)  
ECHEZONA CHUKS NWAJAGU (02)

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SEALED INDICTMENT

18 U.S.C. § 1349 (18 U.S.C. § 1341)  
Conspiracy to Commit Mail Fraud

18 U.S.C. § 1341  
Mail Fraud

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)  
FORFEITURE NOTICE  
2 Counts

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A true bill rendered

DALLAS

*Andrew L. Pugh*  
FOREPERSON

Filed in open court this \_\_\_\_\_ day of January, 2012

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Clerk

No Warrant to Issue

*Erin Camille Rags*  
UNITED STATES MAGISTRATE/~~DISTRICT~~ JUDGE

Magistrate Case Pending 3:11-MJ-591

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

## Related Case Information

Superseding Indictment: ☐ Yes ☒ NoNew Defendant: ☒ Yes ☐ NoPending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #):

Search Warrant Case Number: \_\_\_\_\_

Rule 20 from District of: \_\_\_\_\_

Magistrate Case Number: 3-11-MJ-591

ORIGINAL  
SEALED

## 1. Defendant Information

Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

ECHEZONA CHUKS NWAJAGU (2)

Alias Name

Address

8-12CR-010-K

County in which offense was committed:

Dallas

## 2. U.S. Attorney Information

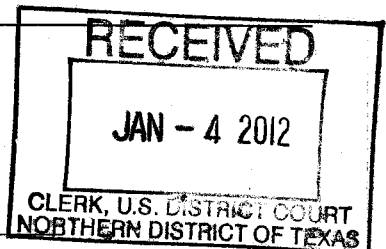
J. NICHOLAS BUNCH

Bar # 24050352

## 3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_



## 4. Location Status WARRANT TO ISSUE

- ☒ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

## 5. U.S.C. Citations

Total # of Counts as to This Defendant: 2



Petty



Misdemeanor



Felony

Citation

Description of Offense Charged

Count(s)

18 U.S.C. § 1349 (18 U.S.C. § 1341)

Conspiracy to Commit Mail Fraud

1

18 U.S.C. § 1341

Mail Fraud

2

18 U.S.C. § 981(a)(1)(C)

FORFEITURE NOTICE

and 28 U.S.C. § 2461(c)

Date

01-03-2012

Signature of AUSA:

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**
**Related Case Information**
Superseding Indictment: ☐ Yes ☒ NoNew Defendant: ☒ Yes ☐ NoPending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:)

Search Warrant Case Number: \_\_\_\_\_

Rule 20 from District of: \_\_\_\_\_

Magistrate Case Number: 3-11-MJ-591
**1. Defendant Information**
Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

PRINCE CHIEMELA NWANKUDU (1)

Alias Name

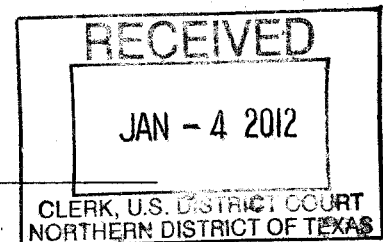
Address

**8-12CR-010-K**

County in which offense was committed:

Dallas
**2. U.S. Attorney Information**
J. NICHOLAS BUNCHBar # 24050352
**3. Interpreter**
☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_


**4. Location Status NO WARRANT TO ISSUE**

- ☒ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**
Total # of Counts as to This Defendant: 2☐ Petty☐ Misdemeanor☒ Felony

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18 U.S.C. § 1341

Mail Fraud

2

18 U.S.C. § 981(a)(1)(C)

FORFEITURE NOTICE

and 28 U.S.C. § 2461(c)

Date

01-03-2012

Signature of AUSA:

H. R. [Signature]